

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PLAINTIFF	:	Civil Action No.:
	:	
NANCY HUFF	:	
605A Madison Drive	:	
Monroe Township, New Jersey 08831	:	
	:	
vs.	:	
	:	
DEFENDANTS	:	
	:	
HARRISON GROUP HALE & JOHN	:	COMPLAINT
HARRISON PARTNERSHIP, d/b/a DOUBLETREE:	:	
by HILTON OCEAN CITY OCEANFRONT	:	
HOTEL, JOHN DOE 1-10, AND ABC CORP. 1-10	:	
106 North Baltimore Avenue	:	
Ocean City, Maryland 21842	:	
	:	

Plaintiffs, Nancy Huff, a resident of Monroe Township, New Jersey, by way of Complaint against the Defendants above says:

JURISDICTION

1. This Court has diversity jurisdiction over this action pursuant to 28 U.S.C. § 1332(a) as the amount in controversy in this personal injury action exceeds \$75,000. Plaintiff is an individual residing and doing business in the State of New Jersey and County of Middlesex. As set forth below, the Defendant is a Maryland entity organized pursuant to and with a principal place of business located in the State of Maryland.

VENUE

2. As the Defendant is a corporate entity organized pursuant to the laws of the State of Maryland, The United States District Court for the District of Maryland is the appropriate venue pursuant to 28 U.S.C. § 1391(b)(1).

FIRST COUNT
NEGLIGENCE

1. Upon information and belief, Defendant HARRISON GROUP HALE & JOHN HARRISON PARTNERSHIP d/b/a Doubletree by Hilton Ocean City Oceanfront Hotel (Harrison), is an entity organized pursuant to the laws of the State of Maryland or one of the several states, which owns, leases, operates, maintains, manages or otherwise controls premises located at 3301 Atlantic Avenue, Ocean City, Maryland, and more commonly known as the Doubletree by Hilton Ocean City Oceanfront Hotel (Doubletree).
2. Defendants JOHN DOE 1-10 and ABC CORP 1-10 are unknown individuals or entities, which are presently unable to be identified, which own, lease, operate, maintain, manage or otherwise controls premises located at 3301 Atlantic Avenue, Ocean City, Maryland, and more commonly known as the Doubletree by Hilton Ocean City Oceanfront Hotel.
3. On or about May 23, 2019, Plaintiff Huff was a business invitee at the Doubletree, and was lawfully on premises owned, leased, operated, maintained, managed or otherwise controlled by Defendants Harrison, John Doe 1-10 and/or ABC Corp 1-10, located at or near 3301 Atlantic Avenue, Ocean City, Maryland.
4. At the time and place aforesaid, Defendant Harrison was responsible for the maintenance, landscaping, and upkeep at the aforementioned property.
5. At the time and place aforesaid, Defendants John Doe 1-10 and/or ABC Corp. 1-10, were responsible for the maintenance, landscaping and upkeep at the aforementioned property on behalf of Defendants Harrison and John Doe 1-10 and/or ABC Corp 1-10.
6. The Defendants Harrison and John Doe 1-10 and/or ABC Corp 1-10 negligently created a dangerous condition on the aforementioned property causing Plaintiff to fall and sustain serious and permanent personal injuries.

7. The Defendants Harrison and John Doe 1-10 and/or ABC Corp 1-10 negligently failed to inspect the property to discover and correct the dangerous condition thereof.
8. The Defendants Harrison and John Doe 1-10 and/or ABC Corp 1-10 had actual or constructive knowledge in sufficient time of the dangerous condition of the property, to take proper precautions to protect against the dangerous condition.
9. The Defendants Harrison and John Doe 1-10 and/or ABC Corp 1-10 negligently failed to warn the Plaintiff of the dangerous condition of the premises.
10. The Defendants Harrison and John Doe 1-10 and/or ABC Corp 1-10 owed a duty of care to the Plaintiff, as outlined above.
11. As a direct and proximate result of the negligence of the Defendants aforesaid, and breach of their duty of care to the Plaintiff, Nancy Huff sustained serious and permanent personal injuries, has suffered and will in the future suffer great pain, has incurred and will in the future incur expenses to cure and alleviate her said injuries, and has been and will be prevented from pursuing her normal activities and occupation resulting in a loss of income.

WHEREFORE, Plaintiff Nancy Huff demands Judgment against the Defendants, Harrison and John Doe 1-10 and/or ABC Corp 1-10 for damages together with interest and costs of suit.

CERTIFICATION

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery;

and (4) the complaint otherwise complies with the requirements of Rule 11.

DESIGNATION OF TRIAL COUNSEL

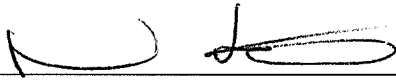
Neil Dubovsky, Esq. is hereby designated as trial counsel for the Plaintiff, Nancy Huff.

JURY DEMAND

Plaintiffs hereby demand a jury trial as to all issues raised in the foregoing Complaint.

Respectfully submitted,

Dated: March 22nd, 2022



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